

August 4, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So. Ag Stop 0268
Washington, DC 20250

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset Review, Docket number TM-04-07. Vita-Pakt Products Company supports the continued allowance of the following substance(s):

Name of Substance	Location on National List 205.605(a), 205.605(b), 205.606)	Reason for continued allowance.	Supporting Data
Citric Acid	205.605(a)	Natural substance present in the Citrus fruit, which is the raw material we use to make the product. It is added to standardize pH.	GRAS by the US FDA without restrictions and Safe Food Additive FAO/WHO without restrictions.
Hi methoxy Pectin	205.606	Natural substance present in the Citrus fruit, which is the raw material we use to make the product. It is added for gel formation.	GRAS by the US FDA and used in all unstandardized foods. Acceptable Daily Intake as “not specified” by the FAO/WHO (JECFA).
Lo methoxy Pectin	205.605b	Natural substance present in the Citrus fruit, which is the raw material we use to make the product. It is added for gel formation.	GRAS by the US FDA and used in all unstandardized foods. Acceptable Daily Intake as “not specified” by the FAO/WHO (JECFA).

Sincerely,

Oris Paul Gottschall
Technical Services Manager
Vita-Pakt Products Company

Cc: Organic Trade Association
National Organic Standards Board